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Supplemental Request
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283488



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January 12, 2007

VC54N088
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VIA OVERNIGHT MAIL

Susan Scott, Esq,
Office of Enforcement
1 Congress Street – Suite 1100
Boston, MA 02114

**Re: Supplemental Request for Information Re Former Whitney Barrel Company at
Wells G&H Site in Woburn, MA.**

Dear Ms. Scott:

Thank you for taking the time to talk to me about the above-referenced matter. As we discussed, it does not appear that any Verizon company is the proper party to respond to the above-referenced Supplemental Request for Information (RFI). Rather, it appears that the letter should have been addressed to OSRAM Sylvania (OS). I have, therefore, sent a copy of your letter to OS. My contact at OS is Ms. Christine Sheedy. Her contact information is:

Christine Sheedy, Risk Manager
OSRAM SYLVANIA
100 Endicott Street
Danvers, MA 01923
Telephone: 978-750-2388
Fax: 978-646-4935
E-mail: Christine.Sheedy@sylvania.com

Based upon Mr. Marshall's letter and the nexus documents supplied with the RFI, it appears that the EPA wants to know about wastes resulting from the operations of Sylvania Corporation (Sylvania). Sylvania never had a corporate relationship with Verizon New England, the entity that responded to the earlier information request. I believe that the confusion results from the fact that Sylvania was a subsidiary of GTE Products Corporation (GTEPC) which, like Verizon New England, is a subsidiary of Verizon Communications Inc. (Verizon). However, Sylvania was sold to OS before GTE Corporation was purchased by Verizon.

Verizon New England is not likely to have any Sylvania documents in its possession and does not have any real knowledge of the operations and practices of Sylvania. Therefore, there is no reason why it would have discussed Sylvania operations in its earlier RFI response. Moreover, the nexus documents that were supplied with the most recent RFI do not trigger any ability for Verizon New England to provide any useful information. Therefore, it does not appear that any further response on the part of Verizon New England is useful or necessary. In addition, any liability that GTEPC may have for the site would relate back to the agreement under which Sylvania was sold to OS, and not as a result of any GTE status as a PRP. Hence, it would be neither useful nor appropriate for GTEPC to respond to this RFI.

As noted above, we believe that OS is the proper party to provide information relating to past Sylvania operations. While I have forwarded a copy of the RFI to OS, the EPA should probably do so as well. Of course, GTE Products of Connecticut and GTE Operation and Support Inc. (a company that manages certain GTE obligations) will inspect their files and will forward to OS any (if any) documents or information that may be relevant to the RFI.

Please feel free to contact me if you continue to believe that any Verizon entity should be responding to the RFI or if you have any questions or concerns about this matter.

Very truly yours,

A handwritten signature in black ink, appearing to be 'J. Agostinelli', written in a cursive style.

Cc: Christine Sheedy
J. Agostinelli
J. McCormick